

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
(Roanoke Division)**

JORDAN PEYTON,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 7:23-cv-00209-MFU
)	
)	
KARL KUHN)	
)	
Defendant.)	
_____)	

PROPOSED ORDER TO AMEND SCHEDULING ORDER

The Parties, by their respective counsel, and pursuant to this Court's October 27, 2023 Order (Doc. 29), respectfully submit this proposed order to amend the scheduling order's trial date (Doc. 12). Both Parties are working cooperatively to resolve discovery disputes and complete thorough discovery, but the Parties require more time to complete the discovery process.

Both parties agree to the following amendment:

TRIAL DATES

**A date available to the Court
in September 2025 or later**

DEADLINE TO COMPLETE DISCOVERY	90 days before trial date
--------------------------------	---------------------------

DEADLINE TO FILE DISPOSITIVE MOTIONS	75 days before trial date
--------------------------------------	---------------------------

DEADLINE FOR HEARING DISPOSITIVE MOTIONS	45 days before trial date
---	---------------------------

DEADLINE FOR HEARING MOTIONS IN LIMINE	14 days before trial date
---	---------------------------

Dated: January 1, 2025

Respectfully submitted,

<u>/s/ Benjamin F. North</u> Benjamin F. North, VSB No. 97439 Lindsay R. McKasson, VSB No. 96074 Jared J. Roberts, VSB No. 97192 BINNALL LAW GROUP, PLLC 717 King Street, Suite 200 Alexandria, Virginia 22314 Phone: (703) 888-1943 ben@binnall.com lindsay@binnall.com jared@binnall.com Aaron B. Houchens, VSB No. 80489 AARON B. HOUCHENS, P.C. 111 East Main Street P.O. Box 1250 Salem, Virginia 24153 Phone: 540-389-4498 aaron@houchenslaw.com <i>Counsel for Plaintiff</i>	<u>/s/ Jim H. Guynn</u> Jim H. Guynn, Jr. (VSB No. 22299) Matthew J. Schmitt (VSB No. 96513) GUYNW WADDELL, P.C. 415 S. College Avenue Salem, Virginia 24153 JimG@guynnwaddell.com MattS@guynnwaddell.com <i>Counsel for Defendant</i>
---	--